

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DAN J. RAMOS, LAURA POSADAS,  
and TINA WILLIAMS,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC., and  
LYFT INC.,

Defendants.

CIVIL ACTION NO.  
No. 5-14-CV-00502-XR

**REPORT OF THE PARTIES' PLANNING MEETING**

1. The following persons participated in a Rule 26(f) conference on November 18, 2014 by telephone conference:

Jose Garza, representing Plaintiffs;

Jonathan Rector, representing Defendant Uber Technologies, Inc.; and

Danny David, representing Defendant Lyft, Inc.

2. Initial Disclosures. The parties have completed the initial disclosures required by Rule 26(a)(1).
3. Discovery Plan. The parties propose this discovery plan:

- a. Plaintiffs propose discovery will be needed on these subjects:

1. The operating policies and structure of Defendants;
2. The application process, screening, selection, and training of drivers for Defendants;

3. Financial arrangements of Defendants with drivers and riders;
  4. Incentives for employees and/or drivers for Defendants;
  5. Communications between Defendants and their drivers and/or employees;
  6. Policies or communications of Defendants regarding service areas, service to customers, and service to disabled callers or customers; and
  7. Other claims advanced or to be advanced by Plaintiffs.
- b. Defendants Uber and Lyft anticipate discovery will be needed on the following subjects:
1. Whether Plaintiffs qualify as disabled under the ADA and Title III;
  2. Plaintiffs' damages;
  3. The feasibility and cost of implementing the injunctive relief sought by Plaintiffs; and
  4. Any other defenses advanced or to be advanced by Defendants.
- c. Discovery will begin once the parties have conferred as required by Rule 26(f). Discovery will end in accordance with the Court's scheduling order.
- d. The maximum number of interrogatories will be governed by the Federal Rules of Civil Procedure.
- e. The maximum number of requests for admission will be governed by the Federal Rules of Civil Procedure.
- f. The maximum number of depositions will be governed by the Federal Rules of Civil Procedure.
- g. The maximum length of depositions will be governed by the Federal Rules of Civil Procedure.

- h. The dates for exchanging expert reports under Rule 26(a)(2) will be in accordance with the Court's scheduling order.
  - i. The deadline for filing supplement reports under Rule 26(e) will be in accordance with the Court's scheduling order.
- 4. Other Items:
  - a. Parties at this time have no requested dates for pretrial conferences.
  - b. The deadline for Plaintiffs to file a motion seeking leave to amend pleadings will be in accordance with the Court's scheduling order.
  - c. The deadline for Defendants to file a motion seeking leave to amend pleadings will be in accordance with the Court's scheduling order.
  - d. The deadline for filing dispositive motions will be in accordance with the Court's scheduling order.
  - e. Plaintiffs are open to settlement discussions at this time. Defendants are not open to settlement discussions at this time.
  - f. All parties will be open to alternative dispute resolution procedures at the appropriate time.
  - g. The deadline for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists will be in accordance with the Court's scheduling order.
  - h. The deadline to file objections under Rule 26(a)(3) will be in accordance with the Court's scheduling order.
  - i. The trial date will be in accordance with the Court's scheduling order. The estimated length of the trial is approximately one week or less.

DATED: December 5, 2014

Respectfully submitted,

BY: /s/ Jose Garza

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